

HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time)

RESPONSE DEADLINE: March 30, 2015 at 4:00 p.m. (Eastern Time)

LOWENSTEIN SANDLER LLP

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS, INC., *et al.*,
Debtors.

Chapter 11

Case No. 08-13555 (SCC)
(Jointly Administered)

**JOINDER OF FIRST CHOICE POWER, L.P. TO OBJECTIONS TO DEBTORS'
MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES
PURSUANT TO SECTION 107(1) OF THE BANKRUPTCY CODE**

First Choice Power, L.P. ("FCP")¹, by and through its counsel, Lowenstein Sandler LLP, joins in the various objections to Debtors' *Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* (the "Motion") [D.I. 48939]. Like the parties filing the objections to the Motion, FCP prepared and filed a Derivative Questionnaire containing certain confidential and proprietary trading and other information in reliance upon the confidentiality protections set forth in the Bar Date Order.

¹ Various entities formerly known as Reliant Energy and certain of its then affiliates also join in this joinder.

WHEREFORE, FCP respectfully requests that the relief requested in the Motion be denied, or in the alternative and in the event this Court orders disclosure, that appropriate protections be maintained with respect to the confidential and proprietary information set forth in the Derivative Questionnaire so that such information is not made generally public.

Respectfully submitted,

Dated: March 30, 2015

LOWENSTEIN SANDLER LLP

By: /s/ Michael S. Etkin

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